REMARKS

Applicant thanks the Examiner for the thorough consideration given the present application.

Claims 1-17 are pending, of which claims 1, 2, 8, and 12-14 are independent. Claim 9 is amended for clarity. Claims 12-14 are amended to preclude interpretation under 35 U.S.C. §112, sixth paragraph.

The amendment to claim 9 renders moot the rejection of the claim under 35 U.S.C. §112, second paragraph, as being indefinite.

Applicants traverse the rejection of claims 1-4, 6, 15, and 17 under 35 U.S.C. §102(e) as being anticipated by Williams et al. (U.S. 6,226,289), as well as the rejections under 35 U.S.C. §103(a) of claims 5 and 16 as being unpatentable over Williams in view of Nodoushani et al. (U.S. 6,563,816), claim 11 as being unpatentable over Williams and Brinkman in view of Nodoushani, and claims 8-10 and 14 as being unpatentable over Williams et al. in view of Brinkman et al. (U.S. 5,712,908).

The Office Action mailed January 14, 2004, acknowledged Applicant's claim for priority based on GB 9923866.9, filed October 8, 1999, and receipt of the certified copy of the priority document. Applicant's foreign priority date precedes Nodoushani's filing date of November 28, 2000, based on a continuation of an application filed November 17, 1999. Removal of Nodoushani as a

reference against the present application is in order, and such action is respectfully requested.

Williams describes a system for dynamically routing selected calls through an intelligent switched telephone network. *See the Abstract.* Within each piece of equipment Williams describes, a processor receives a message that was addressed to that specific processor, on a single channel, interprets the content, and proceeds according to some policy by emitting a new message. Routing of the new message is done according to "translation tables." *See column 22, line 52.* To summarize the passage from column 22, line 39, through column 23, line 15, and FIG. 6d, cited in the Office Action:

(1) switching point (SP) 34 receives a call request from caller A;

(2) SP 34 reserves an idle member of ISUP trunks 200;

(3) SP 34 forwards an Initial Address Message (IAM) over A-links 206 to ISTP 232;

(4) the ISTP forwards the IAM over A-links 206 to switching point 36;

(5) SP 36 maps the IAM parameters into an ISDN call setup message forwarded to Intelligent Peripheral (IP) 214;

(6) IP 214 returns messages to SP 36, and dispatches a data message to ISTP 232, giving the "IP" address of IP 214; and

(7) SP 36 dispatches Address Complete (ACM) and Answer (ANM) Messages to SP 34, over A-links 206 and via ISTP 232.

Thus, Williams is concerned with the operation of switching equipment (SPs 34 and 36) under the control of signaling equipment 232 to establish a bearer channel over ISUP trunks 200. The first message (IAM) identifies the trunk using the ISUP protocol, in particular by reference to an Originating Point Code (OPC), Destination Point Code (DPC) and Circuit Identification Code (CIC). *See Williams, column 6, lines 34-41.* Subsequent messages, such as ACM and ANM, identify the same trunk by the SAME ISUP protocol identifiers, OPC, DPC and CIC. The same protocol is used in both cases to identify the same trunk (bearer channel). An ISDN call setup message is also used (step 5 above), but any IAM bearer-channel parameters "mapped" into this message will be the SAME OPC/DPC/CIC parameters, using the SAME ISUP protocol, for the same bearer channel as referenced in the IAM/ACM/ANM messages. These different messages all identify the bearer channel (trunk) using the same (ISUP) protocol.

Although different protocols are used in Williams, they are not used to provide different identifications with respect to the same bearer channel. SS7 ISUP protocol is used between the SPs and the ISTP, and ISDN protocol is used between an SP and the Intelligent Peripheral. These protocols are not used to provide

different identifications of the same bearer channel--they all use the same identification of that channel (which is therefore trivially easy to match). That is, Williams fails to "establish a correlation between the first and second bearer channel identifications."

In contrast, Applicant's claimed invention is directed to establishing a correlation between *different* identifications, according to *different* protocols, of a single bearer channel. For example, OPC/DPC/CIC parameters in an IAM, and endpoint identifier parameters in MGCP (media gateway control protocol) messages. Inasmuch as Williams does not describe a system in which a single bearer channel is identified in two different ways, using two different protocols, Williams cannot anticipate or render obvious Applicant's presently claimed invention.

The Office Action is incorrect in asserting that the "second messages" recited in claims 1 and 12 read on the ACM and ANM messages of Williams. As noted above, Williams' ACM and ANM messages **must** contain the **same** identification (the "first identification") of the bearer channel as the IAMs. That is how the ISUP protocol works. The Office Action does not explain how the ACM and ANM messages meet the requirement of Applicant's claims 1 and 12 for the second messages to contain a "call identifier".

The allegation in the Office Action relating to Applicant's "third messages" invokes again the IAMs sent from SP 34 to ISTP 232. Since these IAMs have already been invoked as the "first messages," they cannot also be the "third messages". Even if the ISDN call setup message were taken to be the "third message", the parameters it contains are simply those of the IAM mapped into it. Again, the Office Action fails to indicate how they contain a "call identifier". It should be noted that although Applicant's first and third messages both may be IAMs (*see, e.g., claims 4 and 6*), these refer to different IAMs. In claim 4, they are "SS7" IAMs, whereas in claim 6, they are inter-MGC IAMs. *See page 6, line 10, of Applicant's specification as filed.* Williams describes only one kind of IAM.

Nowhere is there any reference in Williams to "selecting" messages. Each device in Williams is designed to respond to ALL messages the device receives--that is the reason messages are sent to the device.

Nowhere is there any description in Williams of establishing a correlation between first and second bearer channel identifications. As explained above, Williams describes a system with only ONE kind of bearer channel identification. There is no second bearer channel identification to be correlated. Although the Office Actions states that "completing the call setup and

conversation commencing all messages have been correlated, i.e. they are all linked to each other by various identifiers," this does not correctly reflect the language of Applicant's claims 1 and 12. Rather, claims 1 and 12 recite "a correlation between first and second bearer channel identifications", not between messages. Setting up a call does not constitute establishing a correlation.

The foregoing explanation applies equally to Applicant's claims 2 and 13, with respect to which the Office Action attempts to equate Applicant's "fourth messages" with Williams' sent messages "consisting of an IP address". However, Williams' "IP address" (*see column 23, line 5*) is "the IP address of the IP 214." Thus, in this context, IP clearly means Intelligent Peripheral (*see column 2, line 46; column 8, line 66; and column 10, line 22*). The Office Action has not demonstrated that this address is a "packet network address" as recited in Applicant's claims 2 and 13.

The Office Action also refers to a "transaction identifier such as an identifier relating the current call setup to that data message". Applicant can find no description in Williams of any such identifier. If the rejection is maintained, the Examiner is courteously requested to identify more precisely where the identifier is described.

In addition, Applicant cannot agree that it would have been obvious to include selectors and a correlator as recited in the

present claims.   As noted above, Williams does not describe any

functionality resembling selection, nor does Williams describe

correlation.   On page 7, the Office Action suggests it would have

been obvious to include the selectors and correlator to complete

call setup.   This allegation is not germane, since there is no

description in either Williams or the present application regarding

so using selectors and a correlator.

In view of the foregoing, it is respectfully submitted that

Williams fails to anticipate or render obvious the subject matter

of Applicant's independent claims 1, 2, 8, and 12-14, which are

allowable over the art of record.   Claims 3-7, 9-11, and 15-17 are

also allowable due to their dependence on allowable independent

claims 1, 2, 8, and 12-14, as well as for the additional

limitations provided by these claims.   With regard to claims 4, 6,

15, and 17, it should also be noted that the Office Action's

invoking the same IAMs as both the first and third messages is, as

already explained, fundamentally wrong.   Accordingly, favorable

reconsideration and allowance are in order.

To the extent necessary, Applicant hereby requests any

required extension of time not otherwise requested and hereby

authorizes the Commissioner to charge any prescribed fees not

otherwise provided for, including application processing, extension, and extra claims fees, to Deposit Account No. 07-1337.

Respectfully submitted,

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